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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH
NORTHERN DIVISION**

In re: ALLEN SHAYNE KERR GINA TORRES Debtors.	Case No. 12-29200 Chapter 13 Hon. R. Kimball Mosier <i>Hearing May 13, 2015 at 11:00 a.m.</i>
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**TRUSTEE'S RESPONSE TO DEBTORS' MOTION
TO SHORT-SALE REAL PROPERTY**

Kevin R. Anderson, Chapter 13 Trustee, by and through counsel, hereby responds to the above-referenced Motion as follows:

1. As of the date of this response, the Debtors are current on plan payments.
2. The Motion indicates that the Debtors are attempting a short sale of the residence, which is subject to the approval of the lien holders.
3. The documentary evidence indicates that a portion of the sales proceeds will be used to pay an attorney fee to Chandler and Associates of \$1,000. Unless this party is identified, employed by the estate, and a fee application is filed with the Court prior to the hearing, the Trustee objects to the requested fees.

4. Prior to the hearing, the Debtors should file an amended budget evidencing the ability to make ongoing plan payments and the new living expenses.

5. The Debtors should file a change of address as soon as practicable after relocation.

6. If the Court grants the Motion, the Trustee requests a copy of the settlement statement and/or closing documents within three days of the loan closing.

7. The Trustee has no objection to the requested attorney's fees of David M. Cook of \$750.00 according to the fee application filed.

WHEREFORE, the Trustee objects to entry of an Order granting the relief requested in the Motion.

DATED: April 23, 2015.

Tami Gadd-Willardson /s/
TAMI GADD-WILLARDSON
Attorney for Chapter 13 Trustee

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing paper was served on the following person on April 23, 2015

DAVID M. COOK
ECF Notification

/s/
Office of the Chapter 13 Trustee